

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Application of San Diego Gas & Electric Company  
(U 902 E) for Approval of Energy Storage and Energy  
Efficiency Contracts Arising from the Track IV Local  
Capacity Requirement All Source Request for Offers

Application 16-03-014  
(filed March 30, 2016)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO  
ENTER TESTIMONY, INCLUDING CONFIDENTIAL TESTIMONY**

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August 17, 2016

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Pursuant to Rule 11.1 of the California Public Utilities Commission (“Commission”)’s Rules of Practice and Procedure and direction provided by Administrative Law Judge Allen Peter at the August 12, 2016 Pre-Hearing Conference, San Diego Gas & Electric Company (“SDG&E”) respectfully submits this Motion to Enter Testimony, Including Confidential Information (“Motion”).

**I. MOTION TO ENTER SDG&E TESTIMONY INTO THE RECORD**

In conjunction with the filing of this Motion, SDG&E is serving its evidence in the form of the following testimony, including attachments. Each set of testimony is marked by a proposed exhibit numbers, as listed below. The testimony is briefly summarized in the Application.

- SDGE-1: Prepared Direct Testimony of Emily C. Shults, dated March 30, 2016;
- SDGE-2: Prepared Direct Testimony of Jeffrey Shaughnessy, dated March 30, 2016;
- SDGE-3: PUBLIC Version of Prepared Direct Testimony of Patrick K. Charles, including Attachments A-H, dated March 30, 2016;
- SDGE-3C: CONFIDENTIAL Version of Prepared Direct Testimony of Patrick K. Charles, including Attachments A-H, dated March 30, 2016;
- SDGE-4: PUBLIC Version of Prepared Direct Testimony of George M. Katsufrakis, including Attachment A, dated March 30, 2016; and
- SDGE-4C: CONFIDENTIAL Version of Prepared Direct Testimony of George M. Katsufrakis, including Attachment A, dated March 30, 2016;

- SDGE-5: PUBLIC Version of Prepared Direct Testimony of Scot Rolfe, including Attachments A and B, dated April 14, 2016;
- SDGE-5C: CONFIDENTIAL Version of Prepared Direct Testimony of Scot Rolfe, including Attachments A and B, dated April 14, 2016;
- SDGE-6: PUBLIC Version of Independent Evaluator Report, dated March 24, 2016; and
- SDGE-6C: CONFIDENTIAL Version of Independent Evaluator Report, dated March 24, 2016.

SDG&E hereby moves that these Exhibits be received into the record of this proceeding.

## **II. MOTION TO SEAL PORTIONS OF THE EVIDENTIARY RECORD**

As indicated above, some of the items of evidence (including the testimony of P. Charles, G. Katsufakis, S. Rolfe and the Independent Evaluator Report) contain information that is confidential pursuant to P.U. Code §§454.5(g) and 583; General Order 66-C; D.06-06-066 (including the “IOU Matrix”); and D.08-04-023. As explained in the declarations attached to each set of confidential testimony and the Independent Evaluator Report, confidential treatment and redaction of certain information is necessary in this proceeding to protect against inappropriate disclosure of confidential, commercially sensitive information, including contract terms and bid-related information, pertaining to SDG&E’s electric procurement resources and strategies. With respect to length of confidential treatment, each declaration identifies the appropriate time period based on the D.06-06-066 IOU Matrix categories that apply.

### **III. CONCLUSION**

Based on this Motion, SDG&E respectfully requests that the Commission grant its requests to enter its evidence into the record of this proceeding and seal the confidential portions as indicated above and in the supporting declarations attached to each set of confidential testimony.

Dated this 17th day of August 2016, in San Diego, California.

Respectfully submitted,

/s/ JOHN A. PACHECO

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